

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ALAN D. PAUL,)	
)	
Plaintiff,)	
)	C.A. No.: 06-00225 XXX
v.)	
)	Trial By Jury Demanded
DELOITTE & TOUCHE, LLP,)	
and DELOITTE & TOUCHE, USA, LLP,)	
)	
Defendants)	

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION
DIRECTED TO THE DEFENDANT¹**

1. Plaintiff's personnel file.
2. Copies of any documents related to the negotiations for and or the hiring of plaintiff.
3. All documents including, memoranda, writings, emails of the defendants concerning plaintiffs hiring and/or offering a partnership.
4. Copies of all drafts of the Partner Improvement Plan ("PIP") which was given to plaintiff on or about March 9, 2004.
5. All documents, memoranda, writings, emails relating to, or referring to, the need for the preparing of the "PIP" plans for the plaintiff.
6. All documents, memoranda, writings, emails relating to, or referring to, draft versions of the PIP plan for the plaintiff

¹ These Requests for Production are being made pursuant to F.R.C.P., Rule 34, which requires that any documents that are produced in response are produced "...as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the request.

7. The documents, memoranda, writings, and emails setting forth the defendant firms' income for 2003, 2004, 2005 and 2006.
8. Documents relating to the partnership unit allocations for 2003, 2004, 2005 and 2006.
9. All documents, memoranda, writings, and emails relating to, pertaining to, or mentioning the job/work performance of the plaintiff during the course of his relationship with the defendants.
10. All documents, memoranda, writings, and emails relating to, pertaining to, or mentioning the reduction in partnership units for any other partner of the defendants.
11. All documents, memoranda, writings, and emails relating to, pertaining to, or mentioning the reasons for, the bases for, or the rationale for the reduction in partnership units for those person for whom documents, memoranda, writings, emails were produced in response to Request No. 9.
12. All documents, memoranda, writings, and emails relating to, pertaining to, or mentioning any partner who was removed from the defendant's partnerships in the years 2000-2006.
13. All documents, memoranda, writings, emails relating to, pertaining to, or mentioning any disputes, arbitrations, and/or litigation involving any person for whom documents, memoranda, writings, emails were produced in response to Request No. 11. This request includes any documents used or filed in such disputes, arbitrations, and/or litigation.

14. Minutes of all the meetings of committee of partners established in connection with the hiring of partners from Arthur Andersen LLP in 2002, such committee being referred to in paragraph 5 of the defendant's offer letter to the plaintiff dated May 2, 2002.
15. All documents memoranda, writings, and emails relating to, pertaining to, or mentioning the Cash Accountability Program instituted in Northeast Region on February 5, 2004, including follow-up reports, and unit adjustments or proposed terminations resulting from this program through May 2005.
16. All documents, memoranda, writings, and emails relating to, pertaining to, or mentioning tracking of Comprehensive Tax Solutions introductions and revenue generated for periods June 2002 through May 2005.

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber
GARY W. ABER (DSB #754)
First Federal Plaza, Suite 600
702 King Street, P.O. Box 1675
Wilmington, DE 19899
302-472-4900
Attorney for Plaintiff

DATED: January 3, 2007

